

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
NOV 30 2004

MASSACHUSETTS SOBER HOUSING
CORPORATION,

Plaintiff

v.

CITY OF CHELSEA, JAY ASH, in his capacity
as City Manager of the City of Chelsea,
JOSEPH COONEY, in his capacity as Director
of the Department of Inspectional Services of
the City of Chelsea, and JOSEPH SIEWKO,
in his capacity as Fire Chief of the City of
Chelsea,

Defendants

Civil Action No. 04-10753-JLT

SCHEDULING CONFERENCE JOINT STATEMENT

Pursuant to the Notice of Scheduling Conference, the parties submit the following:

1. Discovery Plan

- a. Written discovery to be served by January 31, 2005.
- b. All fact discovery is to be completed by June 30, 2005.
- c. All trial experts are to be designated and disclosure of information contemplated by Fed.R.Civ.P. 26 to be provided by plaintiff no later than May 31, 2005, and by the defendants no later than June 30, 2005; deposition of plaintiff's experts may be conducted through June 30, 2005; depositions of defendants' experts may be conducted through July 29, 2005.

2. Schedule for Filing of Motions

Motions for summary judgment are to be filed by August 31, 2005; responses are to be filed within fourteen (14) calendar days thereafter pursuant to Local Rule 7.1


3. Certification of Counsel

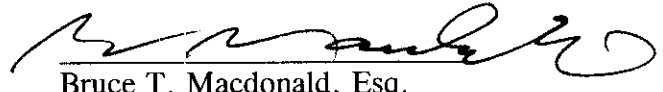
Certifications signed by counsel and an authorized representative of each party affirming that each party and that party's counsel have conferred regarding a budget for the costs of litigation and to consider the use of alternative dispute resolution, are attached.

4. Proposed Conference Agenda

1. Whether instant action should be stayed pending resolution of
Massachusetts Sober Housing Corporation v. Automatic Sprinkler Appeals Board (Middlesex Superior No. 04-2281)
2. Pending investigation by Department of Justice
3. Discovery Plan
4. Alternative Dispute Resolution

Dated: November 30, 2004


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